

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

RALPH S. JANVEY, in his capacity as  
Court-appointed receiver for the Stanford  
Receivership Estate; PAM REED;  
SAMUEL TROICE; and MICOACAN  
TRUST; individually and on behalf of a  
class of all others similarly situated,  
Plaintiffs,

CIVIL ACTION NO. 3:12-cv-04641-N

v.

GREENBERG TRAURIG, LLP;  
HUNTON & WILLIAMS, LLP; AND  
YOLANDA SUAREZ,  
Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE  
TO FILE SECOND AMENDED COMPLAINT**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

NOW COME Plaintiffs, Ralph S. Janvey, in his capacity as the Court-Appointed Receiver for the Stanford Receivership Estate, Pam Reed, Samuel Troice, and Michoacan Trust individually and on behalf of a class of all others similarly situated, and file this Unopposed Motion for Leave to File Second Amended Complaint.

**Certificate of Counsel**

1. Counsel for Defendants are unopposed to this motion.

**MOTION FOR LEAVE**

2. Plaintiffs seek leave to amend to add Greenberg Traurig, PA as a defendant. On November 2, 2018, Greenberg Traurig, LLP answered the amended complaint, disclosing that it did not come into existence until 1999 and that some of the Greenberg Traurig attorneys, whose conduct is the subject of the complaint, were and are employees of Greenberg Traurig, PA.

3. Leave to amend should be freely given, *Robertson v. Plano City of Texas*, 70 F.3d 21, 22 (5th Cir. 1995), unless there is a reason justifying denial, such as: (1) undue delay; (2) bad faith or dilatory motive by the party seeking leave to amend; (3) repeated failure to cure deficiencies by amendments previously allowed; (4) undue prejudice to the opposing party by virtue of allowance of the amendment; or (5) futility of amendment. *Martin's Herend Imports, Inc. v. Diamond & Gem Trading U.S. Co.*, 195 F.3d 765, 770 (5th Cir. 1999). None of these reasons exist here.

4. For these reasons, Plaintiffs seek leave to file the Amended Complaint attached hereto as Exhibit "A."

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that this Court grant leave to file the Amended Complaint.

Respectfully Submitted,

**NELIGAN LLP**

By: */s/ Douglas J. Buncher*  
Douglas J. Buncher  
dbuncher@neliganlaw.com  
Republic Center  
325 N. St. Paul, Suite 3600  
Dallas, Texas 75201  
Telephone: (214) 840-5320  
Facsimile: (214) 840-5301

**CASTILLO SNYDER**

By: */s/ Edward C. Snyder*  
Edward C. Snyder  
esnyder@casnlaw.com  
Jesse R. Castillo  
jc Castillo@casnlaw.com  
700 N. St. Mary's, Suite 405  
San Antonio, Texas 78205  
Telephone: (210) 630-4200  
Facsimile: (210) 630-4210

**CLARK HILL STRASBURGER**

By: */s/ Judith R. Blakeway*  
Judith R. Blakeway  
judith.blakeway@clarkhillstrasburger.com  
2301 Broadway  
San Antonio, Texas 78215  
Telephone: (210) 250-6004  
Facsimile: (210) 258-2706

By: */s/ David N. Kitner*

David N. Kitner  
david.kitner@clarkhillstrasburger.com  
901 Main Street, Suite 4400  
Dallas, Texas 75202  
Telephone: (214) 651-4300  
Facsimile: (214) 651-4330

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of November, 2018, the foregoing Motion was served on all counsel of record via the Court's ECF system.

*/s/ Judith R. Blakeway*  
Judith R. Blakeway